

1 Ryan E. Johnson (Nevada Bar # 9070)
2 WATSON ROUNDS
3 10000 West Charleston Boulevard, Suite 240
4 Las Vegas, NV 89135
5 (702) 636-4902 (phone)
6 (702) 636-4904 (facsimile)
7 rjohnson@watsonrounds.com

8 Stephen M. Gaffigan (Admitted *Pro Hac Vice*)
9 STEPHEN M. GAFFIGAN, P.A.
10 401 East Las Olas Blvd., Suite 130-453
11 Ft. Lauderdale, Florida 33301
12 Telephone: (954) 767-4819
13 Facsimile: (954) 767-4821
14 stephen@smgpa.net

15 *Attorneys for Plaintiff*
16 *LOUIS VUITTON MALLETTIER, S.A.*

17 THE UNITED STATES DISTRICT COURT
18 FOR THE DISTRICT OF NEVADA

19 LOUIS VUITTON MALLETTIER, S.A.,)	Case No. 2:11-cv-00738-PMP-RJJ
20 a foreign business entity,)	
21)	
22 Plaintiff,)	
23)	
24 v.)	
25)	
26 THE PARTNERSHIPS and)	
27 UNINCORPORATED ASSOCIATIONS)	
28 IDENTIFIED ON SCHEDULE "A" and)	
DOES 1-1000,)	
)	
Defendants.)	
)	
)	
)	
)	
)	

**FINAL DEFAULT JUDGMENT AND
PERMANENT INJUNCTION
AGAINST DEFENDANTS IDENTIFIED ON SCHEDULE "A"**




THIS MATTER having come before the Court upon motion by Plaintiff, Louis Vuitton Malletier, S.A. ("Louis Vuitton" or "Plaintiff") for entry of a final default judgment of its claims against the Partnerships and Unincorporated Associations (collectively, the "Defendants") operating under the domain names (the "Subject Domain Names") identified on the attached Schedule A pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure and entry of a permanent injunction; and the Court having considered the moving papers and there being no opposition thereto, and upon entry of Default by the Clerk on October 25, 2011 (e-docket 58);










IT IS HEREBY ORDERED that Plaintiff's Motion for Entry of Final Default Judgment and Permanent Injunction is GRANTED, and judgment is hereby entered in favor of Plaintiff, Louis Vuitton Malletier, S.A., a foreign business entity, with its principal place of business in the Paris, France located at 151, rue Saint Honoré, 5th fl, and against Defendants on all Counts of the Complaint as follows:

(1) Permanent Injunctive Relief:

The Defendants identified on Schedule "A" and their officers, agents, servants, employees, and attorneys, and all persons acting in concert and participation with the Defendants identified on Schedule "A" are hereby permanently restrained and enjoined from:

- (a) manufacturing or causing to be manufactured, importing, advertising, or promoting, distributing, selling or offering to sell counterfeit and infringing goods using the trademarks identified below:

<u>Trademark</u>	<u>Registration No.</u>	<u>Registration Date</u>
	0,297,594	September 20, 1932
LOUIS VUITTON	1,045,932	August 10, 1976
	1,519,828	January 10, 1989
	1,938,808	November 28, 1995

1	LOUIS VUITTON	1,990,760	August 6, 1996
2		2,177,828	August 4, 1998
3		2,181,753	August 18, 1998
4		2,361,695	June 27, 2000
5		2,378,388	August 22, 2000
6	LOUIS VUITTON PARIS		
7		2,399,161	October 31, 2000
8		2,421,618	January 16, 2001
9		2,773,107	October 14, 2003
10		3,023,930	December 6, 2005
11		3,051,235	January 24, 2006

(collectively, the "LV Marks");

- (b) using the LV Marks in connection with the sale of any unauthorized goods;
- (c) using any logo, and/or layout which may be calculated to falsely advertise the services or products of the Defendants identified on Schedule "A" hereto as being sponsored by, authorized by, endorsed by, or in any way associated with Plaintiff;
- (d) falsely representing themselves as being connected with Plaintiff, through sponsorship or association;
- (e) engaging in any act which is likely to falsely cause members of the trade and/or of the purchasing public to believe any goods or services of the Defendants identified on Schedule A are in any way endorsed by, approved by, and/or associated with Plaintiff;
- (f) using any reproduction, counterfeit, copy, or colorable imitation of the LV Marks in connection with the publicity, promotion, sale, or advertising of any goods sold by the Defendants identified on Schedule A, including, without limitation, handbags, wallets, luggage, shoes, belts, scarves, sunglasses, watches, and jewelry;
- (a) affixing, applying, annexing or using in connection with the sale of any goods, a false description or representation, including words or other symbols tending to falsely describe or represent goods offered for sale or sold by the Defendants identified on Schedule A as being those of Plaintiff or in any way endorsed by Plaintiff;
- (b) otherwise unfairly competing with Plaintiff;

- 1 (c) effecting assignments or transfers, forming new entities or associations or
2 utilizing any other device for the purpose of circumventing or otherwise
3 avoiding the prohibitions set forth above; and
- 4 (d) using the LV Marks, or any confusingly similar trademarks, within domain
5 name extensions, metatags or other markers within website source code, from
6 use on any webpage (including as the title of any web page), any advertising
7 links to other websites, from search engines' databases or cache memory, and
8 any other form of use of such terms which is visible to a computer user or
9 serves to direct computer searches to websites registered by, owned, or
10 operated by the Defendants identified on Schedule A.

11 (2) Additional Equitable Relief:

- 12 (a) In order to give practical effect to the Permanent Injunction, the Subject
13 Domain Names, which have not been the subject of a dismissal in this action,
14 are hereby ordered to be immediately transferred by the Defendants identified
15 on Schedule "A," their assignees and/or successors in interest or title, the
16 Registrars and Registries to Plaintiff's control. As a matter of law this
17 equitable relief does not apply to any dismissed domain names;
- 18 (b) Upon Plaintiff's request, the top level domain (TLD) Registry, and any
19 applicable Administrators of registry services, for each of the Subject Domain
20 Names, within thirty (30) days of receipt of this Order, shall place the Subject
21 Domain Names on Registry Hold status for the life of the current registration,
22 thus removing them from the TLD zone files maintained by the Registry
23 which link the Subject Domain Names to the IP addresses where the
24 associated websites are hosted;
- 25 (c) Upon Plaintiff's request, the Internet Corporation for Assigned Names and
26 Numbers ("ICANN") shall take all actions necessary to ensure that the top
27 level domain Registries, and any applicable Administrators of registry
28 services, responsible for the Subject Domain Names transfer and/or disable
the Subject Domain Names; and
- (d) This Permanent Injunction shall apply to all of the Subject Domain Names
and any other new domain names associated with the Defendants identified on
Schedule "A," after such new domain names are properly brought to the
Court's attention and verified by sworn affidavit or Declaration to be used by
the Defendants identified on Schedule "A" for the purpose of counterfeiting
and/or infringing the LV Marks at issue in this action and/or unfairly
competing with Louis Vuitton.

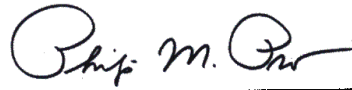
(3) Bond

The bond posted by Plaintiff in this matter should remain in place until further Order of this

1 Court.

2 IT IS SO ORDERED.

3
4 DATED: February 3, 2012.



5 PHILIP M. PRO
6 UNITED STATES DISTRICT JUDGE
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SCHEDULE A
THE PARTNERSHIPS and UNINCORPORATED ASSOCIATIONS

1
2 Defendant 1: 1854louisvuitton.com
3
4 Defendant 4: 3areplicawatch.com
5
6 Defendant 5: 7starplanet.com
7
8 Defendant 6: 86handbags.com
9
10 Defendant 14: bagspart.com
11
12 Defendant 16: bestmirrorbrands.com
13
14 Defendant 18: best-replica-watches.com
15
16 Defendant 20: bipurse.com
17
18 Defendant 21: brandkeys.net
19
20 Defendant 22: buyawatches.com
21
22 Defendant 23: buycheapluxury.com
23
24 Defendant 25: buysns.com
25
26 Defendant 27: chinese-replica.net
27
28 Defendant 28: chinese-replicas.com
29
30 Defendant 31: countbags.com
31
32 Defendant 32: dedoro.com
33
34 Defendant 34: designer-replicahandbags.com
35
36 Defendant 37: eluxuryking.com
37
38 Defendant 38: eluxurys-mart.net
39
40 Defendant 39: eluxuryxp.com
41
42 Defendant 41: etopbagss.com
43
44 Defendant 44: fakehandbagshome.com
45
46 Defendant 45: fashionbagzoom.com

1	Defendant 46:	fashionboutiqueshop.com
2	Defendant 47:	fashionladybag.com
3	Defendant 49:	ffchloe.com
4	Defendant 51:	galaxysahandbags.com
5	Defendant 52:	goodluxuryshop.com
6	Defendant 54:	goto-watches.com
7	Defendant 55:	grabshandbags.com
8	Defendant 61:	handbagsidol.com
9	Defendant 62:	handbagsmama.net
10	Defendant 65:	handbagswin.com
11	Defendant 68:	herebagss.org
12	Defendant 69:	hereisbag.com
13	Defendant 77:	ireplical.net
14	Defendant 78:	itisdesigners.com
15	Defendant 79:	itisreplicas.com
16	Defendant 80:	jajashopping.com
17	Defendant 82:	knockoff-bags.com
18	Defendant 85:	louisvuitton4bag.com a/k/a eluxury4all.com
19	Defendant 86:	louisvuittonbrandbag.com
20	Defendant 87:	louisvuittonbrandbags.com
21	Defendant 88:	louisvuittonhandbagshop.com
22	Defendant 89:	louisvuittonoutletonline.net
23	Defendant 90:	louisvuitton-outlet-stores.com a/k/a louis-vuitton-outlet-stores.net
24	Defendant 93:	louisvuittonsale-shop.com
25		
26		
27		
28		

1	Defendant 96:	luxurymirrorbrands.com
2	Defendant 97:	lv2get.com
3	Defendant 98:	lvbags.cc
4	Defendant 99:	lvoutletsale.com a/k/a e-fashionshopping.com and luxury-estore.com
5	Defendant 102:	mirrorbrands.com
6	Defendant 103:	mobigarden.com
7	Defendant 105:	mychanelhandbags.com
8	Defendant 106:	mylvlife.com
9	Defendant 107:	myshopwww.com
10	Defendant 108:	newbagonsale.com a/k/a newbagpurse.com
11	Defendant 113:	orderluxurybag.com a/k/a vuittonworld.com
12	Defendant 115:	pop-handbags.com
13	Defendant 118:	pop-watches.com
14	Defendant 124:	replica2louisvuitton.com
15	Defendant 125:	replica4lv.com
16	Defendant 126:	replica4lvbags.com
17	Defendant 127:	replicabaghome.com
18	Defendant 130:	replicahandbagclub.com
19	Defendant 132:	replicahandbagsale-online.com
20	Defendant 133:	replicahandbagsbox.com
21	Defendant 136:	replica-louis.com a/k/a lvhandbagsol.com
22	Defendant 141:	replicawatch-uk.com
23	Defendant 142:	replicawell.com
24	Defendant 144:	salelouisvuitton.com
25		
26		
27		
28		

1 Defendant 145: salelouisvuittonbags.com
2 Defendant 146: seasonseshandbags.com
3 Defendant 147: seasonsehandbags.com
4 Defendant 148: sell-brands.com
5 Defendant 149: sell-replica.com
6 Defendant 150: shayes.com
7 Defendant 151: shoplouisvuittonreplica.com
8 Defendant 152: shopping-eluxury.com
9 Defendant 153: shopyep.com
10 Defendant 155: spotbags.net a/k/a pursevalley.com
11 Defendant 158: swissbestwatch.com
12 Defendant 159: swissmirrorwatch.com
13 Defendant 163: thewatch88.com
14 Defendant 167: ugglvgucci.com
15 Defendant 168: uuhandbags.com
16 Defendant 171: walletskey.com
17 Defendant 172: watch126.com
18 Defendant 173: watchbrandhome.com
19 Defendant 174: watchesbit.com
20 Defendant 175: watchesbrand.net
21 Defendant 176: watchvipshop.com
22 Defendant 182: yeahlvwallets.com
23
24
25
26
27
28